Xerox Docket No. D/99599

PATENT APPLICATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE RECEIVED

In re the Application of

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Donald J. CURRY

Group Art Unit: 2625 nology Center 2600

Application No.: 09/450,687

Examiner: T. Johnson

Filed: November 30, 1999

Docket No.: 104378

For: REFORMATTING BINARY IMAGE DATA TO IMPROVE COMPRESSION USING BYTE ORIENTED COMPRESSION

REQUEST FOR RECONSIDERATION

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

In reply to the September 16, 2004 Office Action, reconsideration of the above-identified application is respectfully requested. Claims 1-5 and 7-27 are pending in this application.

The Office Action rejects claims 1-5 and 7-27 under 35 U.S.C. §103(a) over Caklovic (U.S. Patent No. 5,974,179). The rejection is respectfully traversed.

In particular, Caklovic does not disclose or suggest at least reformatting the image by successively interleaving only a single corresponding pixel of each of the N raster lines extending in said second direction, as recited in claim 1, and similarly recited in claims 13 and 18.

Moreover, Caklovic does not disclose or suggest at least a reformatter that reformats raster image data by successively interleaving only a single corresponding pixel of the original image extending in the second direction, as recited in claim 7, and similarly recited in claim 23.

Furthermore, Caklovic does not disclose or suggest at least distributing each bit of the at least one byte to only a single corresponding pixel in each N raster line of the restored image, as recited in claim 5.

Finally, Caklovic does not disclose or suggest at least a decompressor that decompresses compressed interleaved data that was reformatted by successfully interleaving only a single corresponding pixel of the data, as recited in claim 11.

The Office Action admits that Caklovic fails to teach successively interleaving only a single pixel. The Office Action concludes that it would have been obvious at the time of the invention "to modify the pixel area to be 1x 8 as well as 4 x 2." See Office Action, page 3.

However, it is respectfully submitted that Caklovic, when considered in its entirety, teaches away from reformatting the image by successively interleaving only a single corresponding pixel of each of the N raster lines extending in said second direction. See MPEP §2141.02. Specifically, Caklovic discloses that the "[t]o include in the data compression redundancy in the vertical direction, the present invention provides, as shown in Fig. 5a, preprocessor 501 for rearranging memory image 100 into data compression units each including pixels from adjacent scan lines." (emphasis added) See col. 3, lines 53-57. Moreover, Caklovic specifically discloses that "[i]n accordance to the present invention, binary image 100 is rearranged in memory, such that pixels in two-dimensional adjoining picture areas, rather than consecutive pixels on an image line, are sequentially read." (emphasis added) See col. 4, lines 4-7. Thus, because Caklovic clearly discloses that all embodiments of

the method <u>must</u> rearrange the binary image 100 using at least pixels from <u>adjacent scan lines,</u> Caklovic teaches away from the features of claims 1-5 and 7-27.
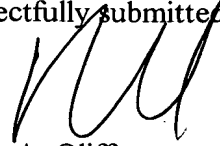
Caklovic <u>does not</u> interleave only a single corresponding pixel of each of the N raster lines because this method <u>would not</u> rearrange the memory image 100 into data compression units each including pixels from <u>adjacent scan lines</u>. Any modification to Caklovic that would allow it to interleave only a single corresponding pixel of each of the N raster lines would <u>change</u> the principle operation of Caklovic because it would not rearrange the memory image 100 into data compression units each including pixels from adjacent scan lines. See MPEP §2143.01.

Although Caklovic discloses that "adjoining picture areas of other configurations are also possible," any modification to change Caklovic into different configurations would still have had to rearrange the memory image 100 into data compression units each including pixels from adjacent scan lines. Because Caklovic fails to disclose or suggest the features of the claimed invention, it would not have been obvious to modify Caklovic to arrive at the claimed invention. Thus, it is respectfully requested that the rejection under 35 U.S.C. §103(a) be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-5 and 7-27 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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